

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Universal Polygram International
Publishing, Inc.; Little Nemo Music;
Lorimar Music A. Corp.; Milksongs; N2D
Publishing Company, Inc.; and Old
Desperados, LLC,

Plaintiffs,

v.

AMG-Woodbury, LLC and Anne E. Loff,

Defendants.

Case No. 0:20-cv-00655 (DSD/TNL)

**Supplemental Declaration of Peter M.
Routhier in Support of Plaintiffs'
Application for Entry of Default against
Defendants AMG-Woodbury LLC and
Anee E. Loff**

Supplemental Declaration of Peter M. Routhier

I, Peter M. Routhier, being of lawful age, state the following facts based on my own personal knowledge and belief:

1. I am an attorney and partner of the law firm Faegre Drinker Biddle & Reath LLP, counsel for Plaintiffs Universal Polygram International Publishing, Inc. Little Nemo Music, Lorimar Music A. Corp., Milksongs, N2D Publishing Company, Inc., and Old Desperados, LLC ("Plaintiffs") in this action.

2. On March 5, 2020, under direction from my office, the Summons and Complaint in this action were served on Defendants AMG-Woodbury, LLC and Anne E. Loff ("Defendants"), as evidenced by the Proofs of Service filed with this Court. (Docs. 8-9.)

3. Earlier this year, my clients and I had been in contact with an individual seeking to resolve this matter on behalf of the Defendants. We therefore asked the Court to grant the Defendants an extension of time to respond to the complaint up to and including April 16, 2020 (doc. 10), which request was granted (doc. 11).

4. Unfortunately, these contacts did not result in an amicable resolution of this matter.

5. On June 19, 2020, the Court ordered Defendants “to answer or otherwise plead to the complaint or submit a stipulation for an extension of time to answer or otherwise plead within 10 days of service of this notice.” (Doc. 12.)

6. On June 24, 2020, under direction from my office, the Court’s June 19, 2020 order – along with a copy of the docket and all other pleadings in this action – were served upon Defendants. (Doc. 13-14.)

7. Pursuant to the Court’s June 19, 2020 order, Defendants were required to respond to the complaint within ten days of the June 24, 2020 service of that order – that is, no later than Monday, July 6, 2020. Defendants have not done so.

8. The time to plead or otherwise respond to the complaint has not otherwise been extended by any agreement of the parties or order of the Court.

9. Defendant AMG-Woodbury, LLC is a limited liability company. It is not a member of the armed forces on active duty military service for the United States, an infant or incompetent.

10. Defendant Anne E. Loff is an individual. She is not a member of the armed forces on active duty military service for the United States, an infant or incompetent.

11. The Servicemembers Civil Relief Act, 50 App. U.S.C. §§ 501 *et seq.* does not apply.

I declare under penalty of perjury that the foregoing is true and corrected.

Executed on July 28, 2020.

/s/ Peter M. Routhier
Peter M. Routhier